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21 UNITED STATES DISTRICT COURT

22 CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

23 *In re: Hyundai and Kia Engine*
24 *Litigation II*

CASE NO. 8:18-cv-02223-JLS-JDE

**DEFENDANTS' REPLY TO
DECLARATION OF TIONNA
DOLIN (Dkt. 134)**

Date: September 8, 2023

Time: 10:30 a.m.

Ctrm: 8A

The Hon. Josephine L. Staton

Trial Date: None Set

1 Defendants Hyundai Motor Company, Hyundai Motor America, Kia America,
2 Inc., and Kia Corporation, submit this reply to the Declaration of Tionna Dolin
3 Requesting Confirmation of Seventeen Consumer's Requests for Exclusion ("Dolin
4 Declaration") (Dkt. 134).

5 As noted in defendants' Notice Regarding Settlement Exclusions, "[a]ny
6 exclusion requests that included incomplete or inaccurate information, such that
7 defendants could not identify the requestor, class vehicle, or VIN, were considered
8 invalid after attempting to resolve the inaccuracy through defendants' internal
9 database and/or outreach to the requester. And exclusion requests that attempted to
10 opt out a non-Class Vehicle or attempted to opt out for a different settlement were not
11 counted." Dkt. 129.

12 Of the seventeen requests for exclusion listed in the Dolin Declaration, sixteen
13 requests were for invalid or non-Class Vehicle VINs:

- 14 1. Maria Campos
- 15 2. Deanna Clark
- 16 3. Penny Beachum
- 17 4. Mayra Bermudez
- 18 5. Joseph Forehan
- 19 6. Nikelle Franklin
- 20 7. Jason Guaschino
- 21 8. Miguel Munoz
- 22 9. Leticia Sanchez¹
- 23 10. Guillermo Sandoval
- 24 11. Robert Thomas
- 25 12. Marilyn Weger

26
27 ¹ Ms. Sanchez's name is spelled incorrectly as "Letucia Sanchez" in the Dolin
28 Declaration.

1 13. Micah Weger

2 14. Donna Wehmeier

3 15. Doress Wehmeier

4 16. Wanpian Zhou

5 Defendants were also not able to identify a valid Class Vehicle VIN based on
6 the other information provided in these requests through defendants' internal database
7 and/or outreach to the requester. Thus, these sixteen requests were not included in
8 defendants' notice of exclusions as defendants could not verify that they belonged to
9 the Class.

10 The only remaining person mentioned in the Dolin Declaration is Aaron Caver,
11 who is in fact included as "Aaron Knox (Caver)" in defendants' notice of exclusions.
12 Dkt. 129-1 at 11.

13 Accordingly, defendants properly excluded sixteen requests mentioned in the
14 Dolin Declaration and confirm that Aaron Caver submitted a valid opt-out request.

15
16 DATED: September 6, 2023

Respectfully submitted,

17 QUINN EMANUEL URQUHART &
18 SULLIVAN, LLP

19
20
21 By /s/ Shon Morgan

Shon Morgan

22 Attorneys for Defendants Hyundai Motor
23 Company, Hyundai Motor America, Kia
24 America, Inc., and Kia Corporation